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UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK WHITE PLAINS DIVISION

In re:

SEARS HOLDINGS CORP.

Case No. 18-23538-rdd Chapter 11

Debtor.

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that Hangzhou GreatStar Industrial Co., Ltd ("GreatStar") hereby requests as provided in 11 U.S.C. §§101(1) and 342 and Bankruptcy Rules 2002 and 9007, that all notices given or required to be given and all papers served or required to be served in this case be given to and sent to the following:

Kiah T. Ford IV, Esq. Parker Poe Adams & Bernstein LLP 401 South Tryon Street, Suite 3000 Charlotte, North Carolina 28202 Telephone: (704) 372-9000 Email: chipford@parkerpoe.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any petition, pleading, complaint, conference, hearing, application, motion, request, or demand, whether formal or informal, written or oral, or transmitted or conveyed by mail, electronic mail, delivery, telephone, telegraph, telex, telecopy, or otherwise in this case.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service nor any subsequent appearance, pleading, claim or suit, is intended to waive and should not be construed as a waiver of GreatStar's (i) right to have final orders in noncore matters entered only after *de novo* review or trial by a District Court, (ii) right to trial by jury in any proceeding or trial so triable herein or in any case, controversy, or proceeding relating hereto, (iii) right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) rights, claims, actions, defenses, setoffs or recoupments to which GreatStar is or may be entitled to under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs or recoupments GreatStar expressly reserves. Further, this Notice of Appearance constitutes a special appearance and is not to be deemed a consent to or waiver of the right to challenge jurisdiction of any court, including, without limitation, the United States Bankruptcy Court for the Southern District of New York, all of which rights are reserved without prejudice.

This the 16th day of October, 2018.

/s/ Kiah T. Ford IV

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